

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 22-CR-00424 MIS

RICKY L. ROMERO, JR.,

Defendant.

UNOPPOSED MOTION TO AMMEND
CONDITIONS OF RELEASE

COMES NOW Ricky Romero, by and through his attorney, Darren Robinson, and hereby moves to amend conditions of release to allow contact with family members under the age of 18 and in support thereof states:

1. A redacted indictment was filed in the above matter charging Mr. Romero with two crimes.
2. On March 23, 2022, The Court held a pretrial detention hearing and ordered Mr. Romero released under several conditions, including the condition that he not have contact with individuals under the age of 18 except for his daughter.
3. This presents a difficulty for Mr. Romero's third party custodian Ricky Romero Sr. Mr. Romero Sr.'s grandchildren frequently visit him, but because of that order, those visits are impossible.
4. Defense has contacted AUSA Joni Stahl and USPO Brenda Richardson about changing the conditions of release to allow Mr. Romero contact with "family members" under 18 instead of just his daughter. Both were quick to respond that they do not oppose such a change.

5. Mr. Romero would be no danger to his nieces and nephews.

THEREFORE, Mr. Romero respectfully requests that the Court change the conditions of release to allow contact with Mr. Romero's minor family members. Essentially, Defense requests that the last word of the order be changed from "daughter," to "family members."

Respectfully submitted,

FEDERAL PUBLIC DEFENDER
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Electronically filed on March 24, 2022.

By: /s/ Darren Robinson

DARREN ROBINSON

Assistant Federal Public Defender